

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

CASE NO: 1:25-cv-20757-JB/Torres

**UNSWORN STATEMENT UNDER PENALTY OF PERJURY OF
PLAINTIFF JANE DOE PURSUANT TO 28 U.S.C. § 1746**

I, Jane Doe, declare as follows:

1. I am over 18 years of age, and competent to provide testimony under oath.
2. I have personal knowledge of the matters herein and, if called to testify at the trial of this matter, I could competently testify as to the facts contained in this declaration.
3. I am providing this declaration in support of Plaintiff's Motion for Protective Order to Governing Public Commentary by Trail Participants.
4. I can attest to the fact that Defendant Steven Bonnell's actions have interfered in the willingness of witnesses to come forward and testify in this action.
5. When I first publicly announced in January 2025 that I would be taking legal action against the Defendant, numerous individuals contacted me with information they believed was pertinent to the case.
6. The majority of these individuals informed me that the Defendant had sent them pornographic content involving other individuals without the individuals' consent or knowledge.
7. One of these individuals, whose screenname was [REDACTED], told me that the Defendant sent the Video depicting me to their sister just a few months ago. This individual

JANE DOE v STEVEN BONNELL
CASE NO: CASE NO: 1:25-cv-20757 JB
Page 2

and their sister, as well as other individuals who had initially contacted me, completely deleted their accounts after Destiny posted his video on YouTube entitled “Destiny Addresses His Lawsuit” on February 20th, 2025. <https://www.youtube.com/watch?v=c5Jwhx3ZggE>

8. In this video, the Defendant further violates my privacy by publishing to his almost one million followers out of context private messages with sexually intimate content that I had sent him sometime in 2020.

9. The three women that provided declarations under seal in support of Plaintiff’s Motion for Preliminary Injunction expressed fear of being publicly targeted or doxxed by Defendant and/or his followers and indicated they were unwilling to participate in discovery or testify unless their identities remain confidential. For this reason, the witness declarations were filed under seal. (See Dkts. 49-2, 49-4, 49-5).

10. Besides these three witnesses, there are four additional witnesses I have contact with, but they have told me they are afraid of speaking out or testifying against the Defendant because of his likely retaliation and harassment. Attached hereto as **Exhibit A**, is a true and correct copy of one of these witnesses named [REDACTED] who has communicated to me her fear of Defendant.

11. Destiny has tried to repeatedly doxx one of these witnesses, whose screenname is [REDACTED], after he publicly expressed his support for me. This potential witness will not testify to pertinent information regarding the case unless his information can be protected. [REDACTED] has expressed fear of providing any further information after Defendant publicly called for his death on the Defendant’s YouTube channel. Attached hereto as **Exhibit B**, is a true and correct copy of his communication to me expressing his fear of Defendant.

JANE DOE v STEVEN BONNELL
CASE NO: CASE NO: 1:25-cv-20757 JB
Page 3

12. The three other potential witnesses also believe that the Defendant has committed crimes against them by disclosing intimate images of them without their consent, but they are afraid of pursuing legal action because of how he has publicly harassed and insulted me and anyone who has supported me, including my counsel. Three of these witnesses have expressed to me their fear that their physical well-being could even be put at risk if they attempt to pursue justice. Attached hereto as **Exhibit C** is a true and correct copy of my conversation with one of these witnesses, whose screen name is [REDACTED], where she communicates her fear of Defendant.

13. Almost every individual I communicated with expressed not only their disgust for Defendant's actions, but also their reluctance to speak out publicly due to their concern and fear of Defendant retaliating against them.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and understanding, the foregoing is true and correct.

Executed in Miami, Florida, this 2nd day of June, 2025.

Jane Doe

Jane Doe